

EXHIBIT A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BROIDY CAPITAL MANAGEMENT LLC and ELLIOTT
BROIDY,

Plaintiff,

Case No.: 18-cv-02421

v.

STATE OF QATAR, STONINGTON STRATEGIES LLC,
NICOLAS D. MUZIN, GLOBAL RISK ADVISORS LLC,
KEVIN CHALKER, DAVID MARK POWELL, MOHAMMED
BIN HAMAD BIN KHALIFA AL THANI, AHMED
AL-RUMAIHI, and DOES 1-10,

Defendants.

PUBLIC

VIDEOTAPED DEPOSITION OF

JOSEPH ALLAHAM

TUESDAY, JUNE 19, 2018

9:00 a.m.

MAGNA LEGAL SERVICES
320 West 37th Street, 12th Floor
New York, New York 10018
(866)624-6221

Reported by: Adrienne M. Mignano, RPR

Job Number: 411069

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1 Allaham - Public
 2 I don't cheer for -- to me, this is cheap
 3 shots.
 4 Q And so you don't know who your
 5 Yuri Vanetik is?
 6 A I have no clue. Never met the
 7 guy.
 8 Q And two text messages down, you
 9 write to Muzin, "I keep on thinking to use
 10 Ben Brafman for Jamal."
 11 And what is it that you thought
 12 Ben Brafman could do for Jamal?
 13 MS. YUSUF: Objection. Asked
 14 and answered.
 15 MR. GIMBEL: Objection.
 16 Misstates his prior testimony.
 17 BY MR. WOLOSKY:
 18 Q What is the meaning of this
 19 sentence, "I keep on thinking to use Ben
 20 Brafman for Jamal"?
 21 A To sue him.
 22 Q That you would sue Jamal?
 23 A Yes.
 24 Q Why would you sue Jamal?
 25 A Because I was getting the

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1 Allaham - Public
 2 runaround.
 3 Q About what?
 4 A About my money.
 5 Q That Jamal owed to you?
 6 A I mean, Jamal, I couldn't sue
 7 the State of Qatar. Everyone -- I
 8 couldn't do that. Nobody was interested
 9 in that.
 10 Q And did you sue Mr. Benomar?
 11 A No.
 12 Q Why did you decide not to sue
 13 him?
 14 A Because the lawyers told me I
 15 don't have an agreement and it will be --
 16 MS. YUSUF: Don't testify to
 17 anything that's privileged.
 18 A Okay, it's privileged.
 19 Q So try to answer the question
 20 without revealing attorney-client
 21 privilege information.
 22 A That I did not want to waste any
 23 money.
 24 Q On lawyers to chase Jamal
 25 Benomar?

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1 Allaham - Public
 2 A Yes.
 3 Q How much money do you think he
 4 owed you?
 5 A It's -- it's complicated. So
 6 it's not something that I would want to
 7 share yet. It's confidential, I think.
 8 Q Well, this is an attorneys' eyes
 9 only deposition. This is directly
 10 relevant to the subject matter of your
 11 subpoena. So I would ask you to please
 12 answer the question.
 13 Can you read back the pending
 14 question?
 15 A I know the question. I
 16 understand the question. Again, it is two
 17 parties that, you know, I think I'm owed
 18 something and the other party thinks I'm
 19 owed something else. So it is hard to
 20 pinpoint, but from my point I would say
 21 from a number, could be from five to ten
 22 million.
 23 Q And you were seeking to pursue
 24 Jamal Benomar for that money even though
 25 the money was really owed to you by the

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1 Allaham - Public
 2 State of Qatar, correct?
 3 A Yes.
 4 Q And is that because Jamal
 5 Benomar was holding that money for you?
 6 A I could not get a straight
 7 answer so I did not know what -- this is
 8 part, you know, your -- you know,
 9 sometimes excuse if you have an offshore,
 10 I was trying to do it. I gave up on that.
 11 It was harder than having a baby.
 12 So I just was trying to pinpoint
 13 to get my money, that's all I was trying
 14 to do. I was being a debt collector.
 15 MS. YUSUF: Counsel, I believed
 16 we have reached the seven-hour mark,
 17 but I will ask the videographer to
 18 confirm.
 19 THE VIDEOGRAPHER: Two minutes.
 20 MR. WOLOSKY: We get eight
 21 hours.
 22 BY MR. WOLOSKY:
 23 Q Can you turn to the next page,
 24 please, Bates stamped 40.
 25 "You see juice in it?" Do you